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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

LOS ANGELES PRESS CLUB,
STATUS COUP,

PLAINTIFFS,

v.

CITY OF LOS ANGELES, a
municipal entity, JIM McDONNELL,
LAPD CHIEF, sued in his official
capacity;

DEFENDANTS.

Paul Hoffman, SBN 71244
Michael Seplow, SBN 150183
John Washington, SBN 315991
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Case No. 25-cv-05423 HDV-E

**NOTICE OF SUPPLEMENTAL
AUTHORITY IN SUPPORT OF
PLAINTIFFS' APPLICATION FOR
PRELIMINARY INJUNCTION**

Hon. Hernán D. Vera

Date: August 25, 2025

Time: 10:00 am

Ctrm: 5B

1 Plaintiffs hereby provide the Court and Defendants notice of supplemental
2 authority in support of their application for a preliminary injunction to be heard by the
3 Court on August 25, 2025: *Vasquez Perdomo v. Noem*, No. 25-4312, 2025 WL 2181709
4 (9th Cir. Aug. 1, 2025). This Ninth Circuit decision was issued after Plaintiffs filed their
5 Memorandum of Points and Authorities in Support of Preliminary Injunction, Dkt. No.
6 47, on July 22, 2025.

7 *Vasquez Perdomo* provides guidance for the instant case on several issues,
8 including the Ninth Circuit's holding that the plaintiffs had standing to obtain injunctive
9 relief to block constitutional violations by law enforcement agencies, *id.* at *8-*13; that
10 it was necessary to issue an injunction that applied to all individuals in the Central
11 District, *id.* at *20-*23; that the district court's temporary restraining order requiring law
12 enforcement operations to follow the Fourth Amendment to the U.S. Constitution would
13 not impose an irreparable injury on defendant agencies, *id.* at *23; that the defendant
14 agencies' request to stay the TRO would impose irreparable injury to plaintiffs, *id.*; and
15 that the public interest in upholding the Fourth Amendment favored allowing the TRO to
16 remain in place, *id.* at *24.

17 The City of Los Angeles was granted permission to intervene as a party in
18 *Vasquez Perdomo* and filed an amicus brief in the Supreme Court on August 12, 2025 in
19 support of maintaining the district court's TRO and in opposition to petition for
20 certiorari filed by law enforcement agencies seeking to stay the TRO affirmed by the
21 Ninth Circuit in *Vasquez Perdomo*. See Brief of the City of Los Angeles, the County of
22 Los Angeles, and 20 Central District Cities in Support of Respondents, *Noem v. Vasquez*
23 *Perdomo*, No. 25A169, at

24 https://www.supremecourt.gov/DocketPDF/25/25A169/369502/20250812164454634_2
25 [5A169%20-%20Los%20Angeles%20Amicus%20Brief.pdf](https://www.supremecourt.gov/DocketPDF/25/25A169/369502/20250812164454634_2); Docket, *Noem v. Vasquez*

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1 *Perdomo*, No. 25A169, at


2 <https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/25>
3 [a169.html](https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/25).

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6 Dated: August 17, 2025

Respectfully submitted,

7 LAW OFFICE OF CAROL A. SOBEL
8 FIRST AMENDMENT COALITION
9 LAW OFFICE OF PETER BIBRING
10 SCHONBRUN, SEPLOW, HARRIS,
11 HOFFMAN & ZELDES LLP
12 LAW OFFICE OF SUSAN SEAGER

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By:


Peter Bibring

Attorneys for Plaintiffs